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Food Stamp Nutrition Education Plan Guidance

Federal Fiscal Year 2006





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United States
Department of
Agriculture

Food and
Nutrition
Service

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Dear State Cooperators:

I am pleased to present to you, the State Food Stamp Nutrition Education (FSNE) Plan Guidance for fiscal year (FY) 2006. As in FY 2005, this Guidance includes templates and information for States on how to ensure an expeditious review process. I encourage you to review this document carefully before drafting your State FSNE Plan. Regional Food and Nutrition Service (FNS) staff are available to provide technical assistance to State agencies regarding the preparation of State FSNE plans and reports. State agencies are responsible for ensuring that any sub-grantees follow this guidance and implement approved activities accordingly.

States should submit to FNS a State FSNE plan on or before the August 15 deadline. We are again requesting both an electronic and a paper copy of State plans (including final reports). If FNS deems that changes to the State plan are necessary before final approval is granted, the State must incorporate these changes into their State plan document and resubmit the revised paper and electronic copies to FNS. States are not guaranteed reimbursement of funds for FSNE activities until they have received approval from FNS for activities described in the State's FY 2006 plan. This approval is always contingent on the availability of Federal funds.

As promised, this Guidance does not incorporate any principles specific to the draft FSNE Framework posted for public comment during FY 2004. However, FNS has updated this Guidance to incorporate policy clarifications and reflect the new Dietary Guidelines for Americans released in early 2005 and the forthcoming USDA Food Guidance System. FNS has also revised this Guidance to provide greater clarity on key issues. These changes include the use of the term "Food Stamp Program eligibles" rather than "Food Stamp Program participants and applicants" when referring to the intended FSNE target audience.

These Guidance changes are summarized on the attached *2006 Guidance Highlights*. The FY 2006 Guidance, with marked changes from 2005, will be available on the Food Stamp Nutrition Connection website by March 31, 2005. You may access it at:
http://www.nal.usda.gov/foodstamp/National_FSNE.html.

Throughout the year, please feel free to comment on this Guidance through your FNS regional contacts. We are happy to consider your views and welcome suggestions for improvement.

Sincerely,

Karen J. Walker

Director

Program Accountability Division, FSP

2006 Guidance Change Highlights

These highlights briefly summarize some of the changes to the Fiscal Year (FY) 2006 Food Stamp Nutrition Education Plan Guidance. This summary is not comprehensive and does not list or discuss changes in detail. States should thoroughly review the actual FY 2006 Guidance before submitting their FY 2006 Plan.

1. The Food Stamp Nutrition Education Target Audience

During FY 2005, FNS reassessed legislative intentions and communications of agency policy regarding the target audience of Food Stamp Nutrition Education (FSNE). Concurrently, comments generated during draft FSNE Framework public comment period clearly indicated a fair degree of confusion among States and their subcontracted FSNE providers regarding policy on who could and should receive FSNE.

The FY 2006 FSNE Plan Guidance includes a modified section called Identifying and Understanding the Target Audience. This revision is designed to:

- a) more closely align language in the FSNE Plan Guidance with that stated in the Food Stamp Act, as amended;
- b) facilitate States' ability to identify the intended target audience in community settings; and
- c) clarify the meaning of audience-related terms such as "food stamp eligibles" and "target audience".

A key change related to the FSNE target audience is the use of the term "food stamp eligibles" in lieu of the term "food stamp participants and applicants" when referring to the FSNE target audience. The Food and Nutrition Service (FNS) defines Food Stamp Program (FSP) eligibles as persons that meet criteria for participation in the FSP as described in Federal legislation and regulations. Food stamp participants and applicants are encompassed in this definition as noted in the bullet describing Certified Eligibles below. The 2006 Guidance describes the likelihood of reaching the intended target audience (i.e., FSP eligibles) when FSNE is delivered to certain groups:

- Certified Eligibles. Persons that participate in the formal FSP certification process (e.g., FSP participants) are the only persons known with certainty to meet criteria for participation in the Program. As such, FSP participants, who consist of over 25 million of the nation's neediest people, are at the core of FSNE efforts. State FSNE efforts should be designed and implemented in a manner that maximizes the number of FSP participants reached and their potential for behavior change.
- Likely Eligibles. Many low-income people that are eligible for the Program do not apply. Since non-participating eligibles have not gone through the formal FSP certification process, they are not as easy to identify. To facilitate the delivery of FSNE to non-participating eligibles, FNS is allowing FSNE providers to use gross income levels at or below 130% of the poverty guidelines as a proxy measure for FSP eligibility. States may provide FSNE to persons meeting this proxy criterion without requesting a waiver of Program exclusivity regulations. This is allowed

because persons with incomes less than 130% of poverty guidelines are generally likely to be eligible for the Program. Such persons may be identified by virtue of participation in another means-tested program. Details regarding this proxy criterion are more fully described in the FY 2006 Guidance.

- Potentially Eligible by Site/Location. Activities delivered to persons at venues serving generally low-income persons where at least 50% of persons have gross incomes at or below 185% of the poverty guideline/threshold provide a fair likelihood of benefiting food stamp eligibles. An exclusivity waiver is required and, as in the past, certain conditions must be met to provide FSNE activities in this manner. Since FSNE is intended to provide nutrition education to FSP eligibles, States should consider these waivers only after making a clear effort to provide FSNE to persons that are certified eligibles (e.g., FSP participants) or likely eligibles (by proxy). Even projects with an approved waiver should focus on reaching FSP eligibles and maximizing changes in their behavior. An updated waiver request template has been added that is consistent with the FSP waiver request outline.

2. Incorporation of the 2005 Dietary Guidelines for Americans and the New Food Guidance System

The U.S. Department of Agriculture (USDA) and the Department of Health and Human Services (DHHS) released, on January 12, 2005, the sixth edition of Nutrition and Your Health: Dietary Guidelines for Americans (DGA). The FY 2006 FSNE Plan Guidance acknowledges these new DGAs as the basis for nutritional standards and educational messaging for the FSP. States should review their FSNE interventions, social marketing campaigns and materials to ensure that they support and facilitate diets consistent with the 2005 DGAs and food guidance system. States can review the 2005 DGAs and forthcoming USDA Food Guidance System (anticipated Spring 2005) on the Center for Nutrition Policy and Promotion website at <http://www.cnpp.usda.gov>. FNS recognizes that States may need to update and reprint materials. This effort will benefit from cooperation and collaboration across State FNS programs. This time of revision and updating provides a unique opportunity to ensure that our FSNE messages are consistent with those of other FNS programs and are developed to promote behavior change in the food stamp eligible audience. During the upcoming year, States are encouraged to monitor materials being produced by the Federal government and State FSNE providers so that efforts are not unnecessarily duplicated and to ensure that FSNE funds are used to produce quality materials in areas where they are needed most. The Food Stamp Nutrition Connection, an online FSNE resource system, will continue to serve as the communication hub for FSNE providers, disseminating information on new materials as they become available and providing a place for the sharing of ideas and strategies. The Connection is available at <http://www.nal.usda.gov/foodstamp>.

3. Plan Amendment Deadline

The 2006 State FSNE Plan Guidance notifies States that plan amendments featuring reimbursement requests for new or substantially revised FSNE activities must be submitted to FNS no later than June 30 of the current FY. Submission by this date is necessary to ensure adequate time for FNS review and approval and State implementation of the proposed activities before the end of the FY.

4. Incorporation of Policy Memorandums

Policy communicated through memorandums dated April 22, 2004 and September 17, 2004 is incorporated in this Guidance. This policy pertains to in-kind donations and paid staff time.

5. FSNE Project Staffing

FNS has revised State FSNE Plan Guidance on project staffing to provide for a clear description of the number of staff being proposed, how job duties benefit food stamp eligibles, and the amount of Federal reimbursement being requested. This is crucial to FNS plan approvals and minimizes the need for FNS to request additional information. Starting in FY 2006, States are asked to provide the Full Time Equivalents (FTE) that will be funded through FSNE. A revised optional template is provided.

6. Development of FSNE Materials

Starting in FY 2006, all materials developed or printed using FSNE funds must include a brief message about how the FSP can help provide a healthy diet and how to apply for benefits. This is a slight change from past years when this message was only required on materials used with persons not currently participating in the FSP. This change ensures communication regarding the link between FSP benefits and a healthy diet. Since FSNE materials are increasingly shared among States, inclusion of this message on all materials supports the broader use of quality materials for relevant audiences.

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Food and Nutrition Service Nutrition Education

The U.S. Department of Agriculture (USDA), Food and Nutrition Service (FNS) is committed to improving the nutrition and health of low-income Americans and to assisting in meeting the Healthy People 2010 nutrition and related objectives for the nation (www.healthypeople.gov/). The FNS vision statement emphasizes this commitment: To lead America in ending hunger and improving nutrition and health.

The FNS mission is to increase food security and reduce hunger in partnership with cooperating organizations by providing children and low-income people access to food, a healthful diet, and nutrition education in a manner that supports American agriculture and inspires public confidence.

FNS administers 15 nutrition assistance programs that touch the lives of one in five Americans each year, with the potential to make an important difference in the lives of children and low-income populations by promoting food security, reducing hunger, and improving nutritional status. Please check the FNS web site (www.fns.usda.gov/fns/) for more information on these programs. In conjunction with State and local partnerships, FNS programs also hold great potential to influence food choices and to support healthy eating and related nutrition behaviors.

Effectiveness of nutrition education can be greatly enhanced through collaboration and coordination with all FNS programs and others interested in promoting health and nutrition in low-income populations. Consider capitalizing on the services of community groups, including faith-based organizations, and existing service coalitions at the community level. They can assist in referrals to nutrition education, in providing transportation or in offering facilities for nutrition education sessions to the low income people they reach on a regular basis.

Collaboration and coordination can result in delivery of more uniform messages targeting key community nutrition issues. FNS strongly encourages working together to plan, develop and implement more comprehensive, family-centered nutrition education interventions that reach multiple members of the household through a variety of program channels.

Food Stamp Nutrition Education (FSNE)

Goal

The goal of Food Stamp Nutrition Education (FSNE) is to improve the likelihood that persons eligible for the Food Stamp Program (FSP) will make healthy food choices within a limited budget and choose active lifestyles consistent with the current Dietary Guidelines for Americans and USDA Food Guidance System.

FSNE is intended to help households eligible for the FSP:

- adopt healthy eating and active lifestyles that are consistent with the current Dietary Guidelines for Americans and USDA Food Guidance System. (Dietary Quality)
- enhance practices related to thrifty shopping and preparation of nutritious foods. (Shopping Behavior/Food Resource Management)
- have enough to eat without resorting to emergency food assistance and, if not already participating in the FSP, be aware of its benefits and how to apply for them. (Food Security)
- safely handle, prepare and store food. (Food Safety)

These four “core elements” form the basic range of educational categories in FSNE.

State Food Stamp Nutrition Education Plan

Introduction

This document provides guidance to State agencies regarding Fiscal Year (FY) 2006 FSP State nutrition education plans. Specifically, it:

- assists with the preparation of the State nutrition education plan;
- provides templates for complete and efficient plan submission (Appendix A);
- describes reporting requirements for activities covered by the plan (Appendix B);
- serves as a reference for policy regarding allowable costs and other policy issues (Appendix C);
- provides definitions of key terminology (Appendix D) and abbreviations (Appendix E);
- encourages use of the “Food Stamp Nutrition Connection”, a USDA Web-based nutrition education resource for educators (Appendix F);
- and provides a timeline for FY 2006 planning and reporting (Appendix G).

This guidance is meant to provide information on FSNE in conjunction with OMB Circulars, FSP regulations and policy memorandums. Due to the diversity of FSP nutrition education activities, a comprehensive listing of all allowable and unallowable costs is not practical. All final judgments on what activities and expenses are “reasonable and necessary” are a Food and Nutrition Service (FNS) determination. Please refer to the information on allowable costs in Appendix C as you plan your activities for the upcoming FY.

Nutrition Education Plan Submission and Approval Process

Under current FSP regulations at 7 CFR 272.2 (d), State FSP agencies have the option to provide nutrition education. State FSP agencies seeking Federal funding for FSNE must annually submit a State nutrition education plan to FNS for approval. Two copies of the plan should be submitted to the FNS Regional Office, one paper copy and one electronic copy (as a Microsoft Word 2000 document or Portable Document Format (PDF) file saved on a diskette or CD-ROM). If FNS deems that changes to the State plan are necessary before final approval is granted, the State must incorporate these changes into their State plan document and resubmit the revised paper and electronic copies to FNS.

State Agency Liability

State agencies are accountable for the contents of their nutrition education plan. They are responsible for making allowable cost determinations and are fully liable for repayment of Federal funds should those costs later be determined unallowable. FNS regional office financial management and program staff are available to provide technical and other assistance to State agencies in developing nutrition education plans. The State agency is responsible for providing technical assistance to any sub-grantees to ensure that all projects support the State’s FSNE goals and objectives and to clarify which expenses are eligible for reimbursement through the FSP.

Submission Deadlines

As specified under 7 CFR 272.2 (e) of the regulations, officials of the State agency must sign the FSNE Plan and submit it to the FNS regional office annually no later than August 15 for the following Federal FY's operation. States may submit a plan prior to the August 15 deadline and early submission is highly encouraged. Two copies of the plan should be submitted to the FNS Regional Office, one paper copy and one electronic copy (as a Microsoft Word 2000 document or Portable Document Format (PDF) file saved on a diskette or CD-ROM). If FNS deems that changes to the State plan are necessary before final approval is granted, the State must incorporate these changes into their State plan document and resubmit the revised paper and electronic copies to FNS. Refer to the Plan Approval section below on requested formatting.

A final report on the previous year's activities is due annually by November 30. Submit two copies of the report to the FNS Regional Office, one paper copy and one electronic copy (as a Microsoft Word 2000 document or Portable Document Format (PDF) file saved on a diskette or CD-ROM). Contingent approvals for the upcoming FY may be made pending receipt of the final report. FNS reserves the right to withhold final approval of the subsequent year's plan pending receipt of this final report.

A timeline for the submission process is located in Appendix G.

Plan Approval

Plans that are incomplete, filled with extraneous unnecessary information, or poorly organized impede the review process and can result in a denial or delayed approvals. To expedite approval, FNS recommends that the State agency do the following:

- ☑ Review the plan carefully to assure that it is consistent with the current Guidance. Both State agency program staff and the fiscal officer should review the plan to verify that all activities and costs are allowable, reasonable and necessary for the delivery of FSNE.
- ☑ Construct necessary waiver requests carefully and provide thorough justification and documentation.
- ☑ Use the recommended templates provided in Appendix A. These templates are designed to ensure that necessary information is included and can be easily presented in your plan. These templates are also available electronically at http://www.nal.usda.gov/foodstamp/National_FSNE.html.
- ☑ Incorporate local project plans and reports into a single State plan and report.
 - Describe all FSNE activities in your State using the recommended templates. Submit only one State plan and report even though multiple State sub-grantees

may exist. Do not submit separate plans and reports for each sub-grantee in your State. For example, your plan should include one unified section describing the identified needs of the Food Stamp population in your State, FSNE goals and objectives for the State, etc. Demonstrate that local projects support State goals and objectives and provide the requested details concerning each project's implementation, evaluation and budget.

- ☑ Limit the length of your State plan to not more than 150 pages excluding appendices and limit your final report to 50 pages excluding appendices. Use at least a twelve-point font, one-inch margins and number the pages of your plan. Provide clear and concise descriptions and justifications for the requested items.
- ☑ Verify that State officials have signed and dated the plan.
- ☑ Submit your Plan to your FNS Regional Office early (prior to the August 15th due date).
- ☑ Submit the previous year's final report to FNS by the November 30th due date.

Final Report Deadline Extension

By written request to the FNS Regional Office, States may ask to extend the deadline for Part I of the Plan (the Final Report). FNS reserves the right to withhold final approval of plans pending receipt of the Final Report.

Plan Amendments

State agencies must submit amendments to their plans to FNS for prior approval whenever there are increases in budget or changes in the scope of activities in an approved plan (see Appendix C: Cost Policy). If plan amendments for the current FY include reimbursement requests for new or substantially revised FSNE activities, States must submit them to FNS, complete with supporting documentation, **no later than June 30 of the current FY**. Submission by this date is necessary to ensure adequate time for review, approval and implementation of the proposed activities during the remaining three months of the FY. Two copies of the plan amendment should be submitted to the FNS Regional Office, one paper copy and one electronic copy (as a Microsoft Word 2000 document or Portable Document Format (PDF) file saved on a diskette or CD-ROM). Refer to the Plan Approval section on pages 11-12 for requested formatting.

Management Evaluation Review of State FSNE Projects

Regions select State FSNE projects for on-site review based on one or more of the following factors:

- amount of expenditures over the past FY relative to other States in the Region with similar population demographics and program scope.

- the quality of sample documentation used by the State agency to support reimbursements from the State agency to subcontractors.
- rate of increase in the expenditures from one FY to the next;
- known or suspected difficulties in program administration or operation;
- and length of time since the State's FSNE services were last examined.

This review will assess whether:

- operations are consistent with the terms of the approved plan;
- activities are targeted to participating and potentially eligible FSP clients;
- projects are being evaluated for effectiveness;
- sources of State matching funds are allowable and not used as match for other Federal programs;
- administrative expenses are reasonable, necessary and properly documented and allocated; and
- States are submitting developed materials to the National Agricultural Library, Food and Nutrition Information Center for inclusion on the Food Stamp Nutrition Connection Web site.

Focus of Food Stamp Nutrition Education

State plans should include behaviorally focused, science-based nutrition education interventions, projects or social marketing campaigns that fall within the focus of FSNE and are consistent with FNS priorities. The focus of FSNE is:

- Health promotion (helping people to establish healthy eating habits and an active lifestyle).
- Primary prevention of diseases (helping people who have risk factors for diet-related chronic disease prevent or postpone the onset of disease by establishing more active lifestyles and healthier eating habits).

The Dietary Guidelines for Americans are the foundation for science-based nutrition education in all FNS nutrition assistance programs. Therefore, messages delivered through FSNE must be consistent with the Dietary Guidelines for Americans (USDA, 2005) and the associated Food Guidance System (USDA, 2005). Please refer to the USDA Center for Nutrition Policy and Promotion website <<http://www.cnpp.usda.gov/>> for complete information on the Dietary Guidelines for Americans and the Food Guidance System.

Nutrition Education Core Elements

Four core elements further outline the topical areas of FSNE: Dietary Quality, Food Resource Management/Shopping Behaviors, Food Security, and Food Safety. States should focus on these core elements when preparing their annual plan for nutrition education. States should especially emphasize the core element Dietary Quality and address it in a comprehensive manner. FNS is particularly interested in efforts directed at increasing the consumption of

fruits and vegetables in FSP eligible population and interventions and activities that promote healthy weight through the balance of healthy eating and active living. Descriptions of the core elements are provided in Table I (page 14).

Coordination and Collaboration

The likelihood of nutrition education messages successfully changing behaviors is increased when consistent and repeated messages are delivered through multiple channels. Cross-program coordination and collaboration at the State and community levels includes working together toward a common goal to reinforce and amplify each other's efforts. Collaborative projects necessitate commitments of staff support and time, as well as cost sharing among all involved entities. In their FSNE Plan, States should describe how they are working with other FNS nutrition programs to consistently deliver behavior focused nutrition messages. Written agreements (e.g., Memorandums of Understanding) are needed for all collaborative projects (see Part II, Section B. Goals, Objectives, Strategies and Coordination). These agreements must be signed by a representative of each agency/organization participating in the collaboration.

TABLE I. FOOD STAMP NUTRITION EDUCATION CORE ELEMENT DESCRIPTIONS

Core Element	Definition
Dietary Quality	Applies to the nutritional value of food acquired and how well overall diets of food stamp eligibles compare to the current Dietary Guidelines for Americans and USDA Food Guidance System. Physical activity falls within this element with certain restrictions (see Appendix C for more information).
Shopping Behavior/Food Resource Management	Applies to the practices related to thrifty shopping for and management of food dollars. These include such skills as making shopping lists, reading labels for nutritional value, planning menus and basic cooking.
Food Security	Applies to the general well-being of a household in terms of assured access to an adequate supply of food at all times in order to support a healthy, active life. This includes a readily available supply of nutritious and safe foods and the assured ability to acquire these foods in a socially acceptable manner. Promotion of participation in the Food Stamp Program to eligible nonparticipating persons as part of nutrition education is a critical aspect of this element (see Appendix C: Section C.4 for additional guidance related to Outreach).
Food Safety	Applies to how food is handled. For example, it deals with issues such as hand washing, the length of time food may be left without refrigeration, the temperature at which food should be stored and whether food is properly and fully cooked.

Guidance for State Plan Preparation

The following section provides guidelines for completing your nutrition education plan. The plan consists of two parts: Part I asks you to report on FY 2005 activities, and Part II asks you to report on FY 2006 planned activities. For the convenience of State agencies, we have provided optional templates in Appendix A for use in reporting information requested in this plan guidance. We strongly recommend the use of these templates since omitted, incomplete or poorly organized information will delay nutrition education plan review and approval or result in a denial. Prior to writing your plan, review all guidance carefully to ensure that your plan meets basic requirements.

Part I. Final Report of FY 2005 Nutrition Education Activities

Summarize the nutrition education projects specified in your FY 2005 Plan. This final report is due to your FNS regional office by November 30, 2005. Additional information regarding submission deadlines may be found on page 11.

Section A. State Nutrition Education Report Summary

This section of the report is designed to provide a summary of all FY 2005 FSNE in your State. In table format (see Template 1, Appendix A), summarize your State nutrition education projects and social marketing campaigns. A project is a discrete unit of nutrition education intervention at the local level. A social marketing campaign is an audience-centered approach that features multiple and reinforcing channels of communication that seek to influence behavior (see full definitions in Appendix D). The following information should be included in your report summary by project or social marketing campaign:

1. Name of project or campaign (should correspond with the project name in your 2005 plan).
2. Geographical areas reached (cities, counties or statewide).
3. Type and number of delivery sites (list the type and number of locations where classes were delivered, not the number of times classes were delivered). For example, list the number of unique congregate meal sites where classes were delivered in the State.
4. Length of any social marketing campaigns (i.e., number of months).
5. Description of the audience to whom the project was delivered.
6. Primary nutrition education methods (number and duration of one-on-one counseling sessions, social marketing campaigns, group classes, etc.).
7. Core element(s) covered
8. Key message(s).
9. Type of evaluation (formative, process or impact).

Section B. Contact Summary Data

In table format (see Appendix A: Optional Plan and Report Templates, Template 2), provide the number of contacts with audiences reached through FY 2005 FSNE for each project as well as aggregated State totals. Report contacts made through direct and indirect (including social marketing) activities. States may report contacts with persons or households; however, reporting the number of contacts with persons is preferred. If available, we highly encourage States to report contacts with FSP participants or FSP households specifically as well as the total number of contacts.

1. **Direct Contacts-** refers to the number of face-to-face contacts via one-on-one counseling or group/classroom education. Please specify whether you are reporting contacts with persons or households.
 - o If available, provide the number of contacts with **FSP participants or FSP households** made through direct FSNE activities. For example, if a FSP participant attends 8 FSNE classes, record 8 contacts.
 - o Also, provide the number of contacts with **all persons or households** made through direct FSNE activities. For example, if 10 people attend all 8 classes, record 80 contacts.
2. **Indirect Contacts** are made through the delivery of nutrition education to a household or a person through an indirect and generalized strategy, such as health fairs, waiting room brochures, Web-based modules, newsletters, and social marketing campaigns. Please specify whether you are reporting contacts with persons or households.
 - o If available, provide the number of contacts with **FSP participants or FSP households** made through indirect FSNE activities. For example, if a FSP participant receives 8 newsletters, report 8 contacts.
 - o Provide the number of contacts with **all persons or households** made through indirect FSNE activities. For example, if a radio PSA is played two times to an estimated listening audience of 8,000 low-income persons, report 16,000 contacts.

Part II. Proposed FSNE for Year 2006

Section A. Identifying and Understanding the Target Audience

The Food Stamp Act, as amended, indicates that nutrition education activities should be directed to persons eligible for the FSP. FSP eligibles are persons that meet criteria for participation in the FSP as described in Federal legislation and regulations. Henceforth, use of the term “target audience” in this document will refer to FSP eligibles according to this definition (see also Appendix D: Definitions). Food stamp participants and applicants are

encompassed in this definition as noted in the Certified Eligibles category described in Table II (page 18) and the following paragraph.

Persons that participate in the formal FSP certification process (e.g., FSP participants) and are determined eligible are the only persons known, with certainty, to meet criteria for participation in the Program. As such, FSP participants, who consist of over 25 million of the nation's neediest people, are at the core of FSNE efforts. **State FSNE efforts should be designed and implemented in a manner that maximizes the number of FSP participants reached and their potential for behavior change.**

Many low-income people that are eligible for the Program do not apply. Since non-participating eligibles have not gone through the formal FSP certification process, they are not as easy to identify. To facilitate the delivery of FSNE to non-participating eligibles, FNS is allowing FSNE providers to use gross income levels at or below 130% of the poverty guidelines as a proxy measure for FSP eligibility. Generally, States may provide FSNE to persons meeting this proxy criterion without requesting a waiver of Program exclusivity regulations because the likelihood of FSP eligibility is high for all FSNE recipients. However, persons typically ineligible for the FSP (e.g., incarcerated persons, boarders, or college/university students-see Appendix C) are exceptions to this proxy criterion.

In addition to the direct provision of FSNE to certified eligibles or those eligible by proxy, States can request exclusivity waivers for FSNE projects that may inadvertently reach ineligible persons because:

- It is not practical to separate out FSP eligibles from a group of low-income persons.
- It is not possible to ascertain FSP eligibility even when using the proxy measure.

Projects for which waivers are requested must be delivered to a generally low-income audience, with at least 50% of persons having gross incomes at or below 185% of the poverty guidelines/thresholds. Appendix C, Section A.3 provides further instruction on requesting exclusivity waivers. **Since FSNE is intended to provide nutrition education to FSP eligibles, States should consider these waivers only after making a clear effort to provide FSNE to persons that are certified eligibles or likely eligibles (by proxy).**

Overall, State FSNE plans should clearly show how the target audience will benefit from FSNE activities and demonstrate that resources are used in a way that maximizes FSNE benefits for the target audience. Table II characterizes the potential audiences for State FSNE activities and describes the likelihood that the audience reached will be the intended target audience of FSP eligibles. Under circumstances described in Appendix C: Section A.17, FNS may allow prorated costs that reflect FSNE's share of the total costs associated with nutrition education that reaches a broader audience than those described in Table II on page 18.

Table II. Audiences for Food Stamp Nutrition Education

	Audience	Likelihood of Reaching Food Stamp Eligibles	Examples	Waiver Needed*
1.	Certified Eligibles Includes persons currently participating in or applying for the FSP. <i>This is the known FSP target audience.</i>	FSNE activities delivered to this audience clearly benefit FSP eligibles.	<ul style="list-style-type: none"> Persons referred by the local FSP office. Persons reached through direct marketing to FSP participants. Persons participating in the Food Distribution Program on Indian Reservations (FDPIR; see Appendix C, Section A.3). 	No
2.	Likely Eligibles Persons not falling into category 1 above that have gross incomes at or below 130% of poverty guidelines. It does not include persons typically ineligible for the FSP (e.g., incarcerated persons, boarders, or college/university students-see Appendix C). This is a proxy measure of FSP eligibility for FSNE.	FSNE activities delivered to this audience are very likely to benefit FSP eligibles. Partnerships are needed with other programs that have formal means-tested certification processes and/or similar income participation criteria.	<ul style="list-style-type: none"> Income eligible persons referred by WIC, Medicaid, or Child Nutrition Programs. Persons receiving Supplemental Security Income (SSI) or Temporary Assistance for Needy Families (TANF; see Appendix C, Section A.3 for more details on categorical eligibility). 	No
3.	Potentially Eligible by Site/Location Persons at venues serving generally low-income persons where at least 50% of persons have gross incomes at or below 185% of poverty guidelines/thresholds.	FSNE activities delivered to this audience provide a fair likelihood of benefiting FSP eligibles by providing services in sites/locations primarily frequented by a low-income audience. This audience may be used when it is not possible or practical to separate out Program eligibles and/or identify Program eligibility (e.g., social marketing campaigns). FSNE delivered to this audience should still be designed to meet the needs of FSP eligibles.	<ul style="list-style-type: none"> Persons residing in census tract areas where at least 50% of persons have gross incomes that are equal to or less than 185% of the poverty threshold. Children in schools where at least 50% of children receive free and reduced priced meals. Persons participating in the WIC program. 	Yes

*Exclusivity waivers are needed when FSNE projects will inadvertently reach persons that may be ineligible for the FSP (see Appendix C).

Section A of your State FSNE Plan should describe the target audience in your State and your assessment of their needs. Necessary components of this section of your Plan are outlined below and an optional template (Template 3) is provided in Appendix A.

1. **Describe and justify your methodology for assessing the needs of the target audience in your State and report your findings.** States should first gather needs assessment data from existing data (secondary data collection). Primary data collection (focus groups, surveys, and key informant interviews) may occasionally be needed to fill in gaps identified in secondary data collection. States must clearly describe and justify any proposed primary data collection and identify the anticipated product. This formative research must supplement (not duplicate) existing data and directly relate to the implementation/delivery of FSNE. Additional information on the collection of needs assessment data is available in *Needs Assessment Resource Manual: A Guide for State Nutrition Education Networks* (US Department of Agriculture, Food and Nutrition Service, 1997) at <http://www.fns.usda.gov/oane/MENU/Published/nutritioneducation/Files/NeedsAssmt-Man.pdf>

When available, the following information should be addressed in this section of your plan:

- a. Demographic characteristics of the target audience in your State. Examples of characteristics that may help you plan and deliver FSNE effectively include: geographic location (i.e., areas and neighborhoods where FSP eligibles reside, FSP participation rates, income-relevant census tract information, location of public housing, etc.), race/ethnicity, age, gender, family composition, education and primary language.
 - b. Nutrition-related behavioral and lifestyle characteristics of the target audience in your State. Examples of characteristics that may enhance your ability to develop, target, and deliver FSNE messages include dietary and food purchasing attitudes and habits as well as where and how FSP eligibles eat, redeem food stamp benefits, live, learn, work and play.
 - c. Availability of other nutrition-related programs, services, and social marketing campaigns that target low-income populations in your State (e.g., WIC, Team Nutrition, EFNEP, food banks, public health services). This information will help you identify potential partners for message collaboration and avoid duplication of existing services. State contact information for FNS programs is available at: <http://www.fns.usda.gov/oane/SNAP/SNAPMap.htm>
 - d. Areas of the State where the target audience is underserved or has not had access to FSNE previously. States are encouraged to reflect on how well previous FSNE efforts served the State target audience.
2. **Based on your needs assessment above and the current availability of other nutrition education services, describe and justify how you will reach the target**

audience and what priority areas you will address through FSNE. For instance, your State may wish to focus FSNE efforts on improving fruit and vegetable consumption in FSP households with children. Note that all areas and strategies used to address identified issues must fall within the scope and focus of FSNE. Indicate which issues you addressed in FY 2005 and which ones you plan to address in FY 2006.

Section B. Goals, Objectives, Strategies and Coordination

Template 3 in Appendix A will assist you in completing this section. List your behavioral goals and objectives and the educational strategies and vehicles you will use to achieve them.

1. For the priority areas you described in Section A, identify State nutrition education goals and measurable objectives. Your goals should illustrate the overall purpose of FSNE activities. A well-written and clearly defined objective is **S.M.A.R.T.**:
 - a. **Specific.** It identifies a specific event or action that will take place.
 - b. **Measurable.** It quantifies the amount of change to be achieved.
 - c. **Appropriate.** It is logical and relates to the State's FSNE goals.
 - d. **Realistic.** It is realistic given available resources and the proposed FSNE activities.
 - e. **Time specific.** It specifies a time by which the objective will be achieved. These objectives should be completed within the FY of the plan.

Examples of S.M.A.R.T. objectives include:

- By September 30, 2007, increase the consumption of fruits and vegetables among women and children participating in the FSP statewide by 5% and 3%, respectively, through the delivery of an intensive multi-channel intervention targeting this segment of food stamp population. (State level objective)
- After participating in two or more FSNE activities on label reading, adults will be able to identify foods low in saturated fat, trans fat and cholesterol. (local project objective)
- After 6 1-hour classes, FSNE participants will increase their average daily consumption of dark green vegetables by ½ cup per day. (local project objective)

Your goals and objectives should be conceptually linked at State and local levels. Project level objectives should not be selected in isolation, but should support State FSNE goals.

2. For each objective listed above, describe the nutrition education methods and strategies that will be used to achieve it. Provide the following:

- Specify how you will implement the project, giving particular attention to: how and where it will be delivered, its duration, the projected number of contacts with FSP eligibles and the frequency of contacts (number of classes, mailings, billboards, etc.), key educational messages, core elements covered and any segmentation of the target audience. Describe any social marketing strategies for the development and dissemination of educational interventions.
 - A brief summary of existing research supporting the effectiveness and feasibility of your nutrition education methods.
 - A justification for adapting or changing an identified intervention/project method or strategy.
3. Identify existing educational materials that you plan to use in the delivery of the intervention/project. Note if they are in languages other than English. FNS recommends that States use existing FNS materials (such as Team Nutrition, Loving Support, and Eat Smart. Play Hard.™) instead of purchasing or reprinting other materials that target the same audience.
4. Identify any new materials that you plan to produce. To maximize resources and avoid duplication of effort, State agencies must assess existing materials prior to developing new materials for nutrition education efforts (see number 3 above). Existing materials, especially existing FNS materials such as Team Nutrition, Loving Support, and Eat Smart. Play Hard.™, must be used and/or adapted whenever possible rather than developing new materials. The following collections of nutrition education resources are available to help States search for existing materials:

- Food Stamp Nutrition Connection (see also Appendix F)
www.nal.usda.gov/foodstamp
- Eat Smart. Play Hard.™
www.fns.usda.gov/eatsmartplayhard/
- WIC Works Resource System
www.nal.usda.gov/wicworks/
- Team Nutrition
www.fns.usda.gov/tn

Describe your findings and justify why the development of any new materials is needed. If you plan to develop new materials, refer to “Important Notes About Materials” on page 23.

5. For each objective, provide performance measures or indicators of expected outcome. For example, change in behavior (ate one additional vegetable per day) or improvement in cooking skills (learned how to properly cook dry beans or peas).

6. For each objective, describe your evaluation plans. Evaluation is important for accountability, planning, and learning how to continuously refine and improve nutrition education for the target audience to achieve positive behavior outcomes. The following three types of evaluation are appropriate and may be included in your State plan:

- Formative-which can involve pre-testing of draft nutrition education materials to answer questions about whether materials are understandable, relevant, credible and acceptable to the target audience;
- Process-which can involve such measures as tracking the number of materials distributed, the number of clients reached, effectiveness of alternate methods of delivering nutrition education and/or barriers to implementing the intervention;
- and Outcome or Impact-to learn how effective the intervention was in changing the target populations' attitudes, awareness or behavior.

Evaluation efforts must have direct applications for FSNE delivery and ultimately benefit the target audience through project/intervention improvement. For information about program evaluation, FNS recommends the following guidance:

- Journal of Nutrition Education: 33, Supplement 1, 2001
- Evaluating Social Marketing in Nutrition: A Resource Manual
<http://www.fns.usda.gov/oane/menu/published/nutritioneducation/Files/evalman-2.PDF>
- WIC Evaluation Resource Guide
<http://www.fns.usda.gov/oane/MENU/Published/WIC/FILES/WICEvaluationResourceGuide.pdf>

7. Describe efforts to coordinate, complement and supplement other FNS programs in order to deliver consistent behavior-focused nutrition messages.

- Specifically address your collaborative efforts with FNS Programs in your State (WIC, Child Nutrition programs, etc.), and describe your involvement in developing the State Nutrition Action Plan (SNAP). Outline any objectives/tasks related to the SNAP that FSNE will lead or conduct during the next year.
- School interventions should include a description of ongoing collaboration efforts with the State's Department of Education and local school administration.
- If FSNE will be delivered in coordination with another agency (i.e., WIC, Department of Education, food bank, etc.), the State must submit, with their plan, a copy of a written agreement (e.g., a Memorandum of Understanding) that clearly outlines the responsibilities of all collaborating agencies and is signed by all agencies.

Important Notes About Materials

- States must ensure that all nutrition messages conveyed as a part of FSNE are consistent with the goal, focus, and core elements of FSNE as described on pages 9, 13-14 of this Guidance. FSNE funds may not be used to convey negative written, visual, or verbal expressions about any specific foods, beverages, or commodities. This includes messages of belittlement or derogation of such items, as well as any suggestion that such foods, beverages, or commodities should never be consumed (see Appendix C). FNS regional office staff may ask to review media messages and materials prior to their release, particularly when States are planning large media campaigns and productions.
- FNS reserves a royalty-free, non-exclusive right to reproduce, publish, use or authorize others to use videos, computer programs such CD-ROMs and related source codes, literature, or other products produced, in whole or in part, with FSP funds for government purposes. For more information, see Appendix C.
- Curricula must focus on improving the dietary quality of the target audience and should contain related activities as a way of promoting health and preventing diet-related diseases. Materials with subject matter that is beyond the scope of FSNE, including the screening for diseases and the treatment and management of diseases, are not allowable.
- We encourage States to submit their materials to the Food Stamp Nutrition Connection Web site so that all may benefit. Appendix F provides detailed information about the Food Stamp Nutrition Connection.
- Materials developed or reprinted with FSP funds must include the following non-discrimination statement:

“In accordance with Federal law and U.S. Department of Agriculture policy, this institution is prohibited from discriminating on the basis of race, color, national origin, sex, age, religion, political beliefs or disability.”

“To file a complaint of discrimination, write USDA, Director, Office of Civil Rights, Room 326-W, Whitten Building, 1400 Independence Avenue, SW, Washington, D.C. 20250 or call (202) 720-5964 (voice and TDD). USDA is an equal opportunity provider and employer.”

Note: There are no print size requirements when the statement above is used. If the material is too small to permit the full statement to be included, the material must, at a minimum, include the statement, in print size no smaller than the text, that “This institution is an equal opportunity provider and employer.”

- Credit must be provided to the FSP as a funding source. This credit line must appear on newly developed materials and reprinted materials. The following statements are recommended:
 - English: “This material was funded by USDA's Food Stamp Program.”

- Spanish: “Este material se desarrolló con fondos proporcionados por el Programa de Cupones para Alimentos del Departamento de Agricultura de los EE.UU. (USDA para sus siglas en inglés). “
- A brief outreach message about the FSP must be provided on **all** newly developed or reprinted materials. The following statements are recommended:
 - English: “The Food Stamp Program provides nutrition assistance to people with low income. It can help you buy nutritious foods for a better diet. To find out more, contact [enter your local office or toll-free number, or other useful information to help identify how to get services].”
 - Spanish: “El Programa de Cupones para Alimentos ofrece asistencia relacionada a la nutrición para gente con bajos ingresos. Le puede ayudar a comprar comida nutritiva para una mejor dieta. Para obtener más información, comuníquese con la oficina de servicios sociales de su condado.”

Section C. Staffing

We recommend the use of Template 4 in Appendix A to provide the information requested on costs associated with the employment of staff for FSNE. Please note that all staff paid with FSNE funds must support the delivery of FSNE to FSP eligibles. For each project, provide the following information for **all** paid staff that will carry out FSNE functions. Volunteer time should not be included in this section, but should be included as part of budget narrative describing in-kind donations (see Appendix C, Section A.4 for additional information on in-kind donations).

1. Position title (e.g., Nutrition Educator, Project Coordinator, etc.).
2. For each position title, attach a statement of work/position description outlining the duties associated with the FSNE project. This must clearly show how the position supports the delivery of planned FSNE activities.
3. For each position title, provide the Full Time Equivalents (FTEs) that will be funded through FSNE. FTEs are defined in Appendix D: Definitions. States may use their own definition of FTEs for purposes of reporting FSNE staffing requirements in this section, but must provide their definition with an explanation of how FTEs are calculated.
4. For each position title, provide the percentage of FSNE time the position will spend performing management/administrative duties (including training and professional development) and the percentage of time that the position will spend on direct delivery of FSNE. This information should coincide with information provided in the attached statement of work/position description.
5. For each position title, provide the total salary, benefits and wages, and specify the amount of the total to be funded with Federal dollars and State/other dollars (estimate may be used for budget, but actual time spent must be used for billings).

Section D. Budget Summary

We recommend the use of Template 5 in Appendix A for the submission of this information.

1. Contracts, Grants or Agreements for Nutrition Education Services

If the State agency intends to contract for FSNE with sub-grantees, list each sub-grantee that is a recipient of Federal grants, cooperative agreements or contracts related to FSNE. Include the following for each sub-grantee:

- a. Name of sub-grantee or contractor
 - b. Federal funding requested
 - c. State and other non-Federal funding provided and source in terms of cash and in-kind sources
 - d. Description of services
 - e. Cost of services
2. Attach a copy of any interagency agreement(s) that identifies how Federal funds will be shared between the State or county agency and/or other agencies. Submit a list of all sub-grantees and amount of funding for each grant, noting both Federal funding and funding from non-Federal sources including cash and value of in-kind services. For each sub-grantee, provide the State and Federal cost for each planned nutrition education project. Provide a detailed breakdown that includes at a minimum the information contained in Appendix A, Template 5.
 3. Travel
Travel requests must be identified for both in-state and out-of-state purposes. States must justify the purpose of the travel, describe how the travel request supports the State's FSNE goals and objectives, and demonstrate how they will disseminate the information obtained to both, in-state educators and collaborators and in-state food stamp office staff. **Refer to Appendix C, Section A.16 for information on what travel-related costs are allowable.** Provide the following information for travel **included in your FSNE budget:**
 - a. Travel destination
 - b. Purpose and justification for travel
 - c. Number of staff traveling
 - d. Cost of travel

Section E. Assurances (Appendix A, Template 6)

To assure compliance with policies described in this guidance, the FSNE plan must include the following assurances that:

1. The State food stamp agency is accountable for the content of the State nutrition education plan and provides oversight of any sub-grantees. The State food stamp agency is fiscally responsible for nutrition education activities funded with FSP funds and is liable for repayment of unallowable costs.
2. Nutrition education activities are conducted exclusively for the benefit of **those eligible for the FSP.**
3. **In cases where FSNE projects may inadvertently benefit persons that are ineligible for the FSP because it is not practical or possible to meet the exclusivity requirement, the State has submitted waiver requests for each project. The waiver request(s) clearly demonstrate how the proposed project provides a good means of reaching food stamp eligibles and documents**

that at least 50 percent of those reached will have gross incomes at or below 185 percent of the poverty thresholds or guidelines.

4. Only expanded or additional coverage of those activities funded under the Expanded Food and Nutrition Education Program (EFNEP) may be claimed under the FSNE grant. Approved activities are those designed to expand the State's current EFNEP coverage in order to serve additional food stamp eligibles or to provide additional education services to EFNEP clients who are eligible for the FSP. In no case may activities funded under the EFNEP grant be included in the budget for FSNE.
5. Cash or in-kind donations from other non-Federal sources to FSNE have not been claimed or used as a match or reimbursement under any other Federal program.
6. Costs incurred by other State and/or local agencies for goods and services for FSNE and which are then donated to the food stamp State agency make up the public in-kind contributions that are included in the State share of costs that are eligible for Federal reimbursement. They may not be used as a match under any other Federally funded project.
7. Documentation of State costs, payments, and donations for approved FSNE activities are maintained by the State and will be available for United States Department of Agriculture review and audit.
8. Contracts are procured through competitive bid procedures governed by State procurement regulations.
9. Program activities are conducted in compliance with all applicable Federal laws, rules, and regulations including Civil Rights and OMB circulars governing cost issues.
10. Program activities do not supplant existing nutrition education programs, and where operating in conjunction with existing programs, enhance and supplement them.
11. Program activities are reasonable and necessary to accomplish FSNE objectives and goals.
12. All materials developed or printed with FSNE funds include the appropriate USDA non-discrimination statement, credit to the FSP as a funding source, and a brief message about how the FSP can help provide a healthy diet and how to apply for benefits.
13. Messages of nutrition education are consistent with the Dietary Guidelines for Americans and stress the importance of variety, balance, and moderation, and do not disparage any specific food, beverage, or commodity.

Section F. Waiver Requests

(Appendix A, Template 7)

Under the provisions of 7 CFR 272.3(c), FNS has the authority to approve requests from State agencies for waivers of regulatory requirements, provided the waivers are not inconsistent with the provisions of the Food Stamp Act and do not adversely affect participants or applicants. In addition, States must show how a waiver will improve the efficiency and effectiveness of the FSP, and concomitantly, would not increase Federal costs. The two waivers relevant to the administration of FSNE are noted below with additional detail and instructions pertaining to FSNE-related waiver requests provided in Appendix C, Section A.3 and a general template provided in Appendix A. States that are not requesting any waivers, may skip this section.

When persons that are ineligible for the FSP may inadvertently benefit from FSNE projects because such persons cannot be separated out from those eligible for the Program, States must submit exclusivity waivers for each project (7 CFR 272.3). See Appendix C, section A.3 for information on waiver requests, exceptions to the exclusivity waiver requirement, and details on the justification

and documentation required. Template 7 provides the general waiver request outline. As described in further detail in Appendix C and Template 7, waiver requests must:

- Be completed on a “project” basis, meaning that they are requested for a defined geographical area.
- Describe in detail the procedures the State agency plans to follow in lieu of the regulatory requirement.
- Justify why it is not possible to provide FSNE exclusively to FSP eligibles without inadvertently reaching other audiences.
- Show how the project provides an efficient and effective means of reaching FSP eligibles.
- Anticipate the impact on FSP eligibles in terms of quality of services, any administrative or Program savings, and any adverse effects on FSP eligibles or the State agency if the waiver is not granted.
- Provide documented demographics to demonstrate that at least 50 percent of the population that will benefit from the FSNE activity has an income that is at or below 185% of the poverty guidelines/thresholds.
- Be signed and dated by the requesting official.

Federal regulations prohibit the consideration of private cash donations as part of a State’s expenditures for which FNS will reimburse 50 percent [7 CFR 277.4 (c) & (d)]. However, a waiver is permissible, when certain assurances are provided. See Appendix C, section A.3 for information on private cash donation waivers.

Section G. Signatures **(Appendix A, Template 8)**

The nutrition education plan must be signed by both the State agency Nutrition Coordinator (or alternatively, the State FSP Director) and a State agency Fiscal Reviewer prior to submission.